



January 5, 2021

**By Electronic Mail**

Thomas Carroll  
Acting Director  
Air Enforcement Division  
Office of Civil Enforcement  
U.S. Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW  
Mail Code: 2201A  
Washington, DC 20460

Re: January Update to Response to April 24, 2020 Letter from the U.S. Environmental Protection Agency

Dear Mr. Carroll:

Birla Carbon USA, Inc. (“Birla” or the “Company”) submits this letter as the eighth update to its May 22, 2020 response to the April 24, 2020 letter it received from the U.S. Environmental Protection Agency (“EPA” or the “Agency”) regarding force majeure notices the Company submitted on March 16 and 18, 2020 in anticipated noncompliance with obligations under the Consent Decree between the United States of America, the Louisiana Department of Environmental Quality (“LDEQ”), the Kansas Department of Health and Environment (“KDHE”), and Columbian Chemicals Company. Consent Decree, *United States et al. v. Columbian Chem. Co.*, No. 6:17-cv-01661-RGJ-CBW (W.D. La. June 11, 2018).

Please note that certain attachments to this letter include confidential business information (“CBI”) and are marked as such. Documents marked for CBI are entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B, and are not subject to disclosure under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. We ask that LDEQ and KDHE similarly treat this as CBI under their analogous state laws.<sup>1</sup>

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<sup>1</sup> Certain attachments to this letter include CBI, which Birla has designated as such with the stamp “CONFIDENTIAL BUSINESS INFORMATION NOT SUBJECT TO DISCLOSURE UNDER FOIA.” Based on a review of relevant LDEQ regulations, La. Admin. Code tit. 33, pt. I, § 501(A), Birla understands that it must submit any CBI via mail or delivery to LDEQ and not electronically. At this time, Birla is providing the entire submittal to EPA and KDHE, and will separately submit the letter and its attachments to LDEQ.

## **I. North Bend**

Since our last update, construction was ongoing at North Bend for installation of equipment required under the Consent Decree. As per the attached letter from Birla's engineer of record, SNC-Lavalin Constructors Inc. ("SNC"), due in part to the Company's efforts to expedite the project, overall delays in meeting North Bend Consent Decree deadlines were reduced from a two to four month delay and are now estimated at just over seven weeks from the original target date of October 1, 2021. *See Confidential Attachment 1.* The completion date for the project is now estimated to be November 22, 2021. *See id.*

## **II. Hickok**

Construction is ongoing at Hickok for installation of equipment required under the Consent Decree. *See Confidential Attachments 2, 3, and 4.* Birla received notice from its supply chain lead that the reactor vent scrubbers shipment is delayed. *See Attachment 5.* Birla is working diligently with shipping companies to get the equipment delivered to the site as soon as possible, and the Company paid extra fees to join a priority shipment program. *See id.* The Company was advised by its shipping agent that delivery should be expected in Denver, Colorado on February 22, 2021, where the container will have to clear U.S. Customs and Border Protection ("CBP"). *See Confidential Attachment 6.* Once the container clears CBP, it will be delivered to the site for installation and commissioning. Birla Carbon anticipates that the installation and commissioning will take three to five weeks. Due to this delay and others described in our last notice, Birla estimates the completion date for the project to be April 9, 2021. *See Attachment 7.*

The Company continues enforcing all COVID-19-related requirements at both project sites. COVID-19 cases have gone down since the Company's last notice, but one employee at Hickok was quarantined as of the date of this notice.

We will update you with more details as they become available. Please contact David Buente at 202-255-8684 or [dbuente@sidley.com](mailto:dbuente@sidley.com) if you have any questions in the meantime.

Sincerely,



Randy Waskul  
Global Director, Health, Safety & Environmental

CC: Kellie Ortega, U.S. EPA (by email)  
Patrick Foley, U.S. EPA (by email)  
Chris Williams, U.S. EPA (by email)  
Carlos Evans, U.S. EPA Region 6 (by email)  
Emad Shahin, U.S. EPA Region 6 (by email)  
Lisa Gotto, U.S. EPA Region 7 (by email)

Lisa Hanlon, U.S. EPA Region 7 (by email)  
Amy Algoe-Eakin, U.S. EPA Region 7 (by email)  
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Thomas Mariani, U.S. DOJ (by email)  
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Kate Gleeson, KDHE (by email)  
Dwana King, LDEQ (by FedEx)  
Celena Cage, LDEQ (by FedEx)  
David Buente, Sidley Austin LLP (by email)  
Peter Whitfield, Sidley Austin LLP (by email)

Enclosures: Confidential Attachment 1 - 2021-01-04 - North Bend - SNC Notice of Force Majeure Event

Confidential Attachment 2 - 2020-11-27 - Hickok - Worley Project Update

Confidential Attachment 3 - 2020-12-30 - Hickok - Worley Project Schedule

Confidential Attachment 4 - 2021-01-04 - Hickok - COVID-19 Impact Schedule Analysis

Attachment 5 - 2021-01-04 - Hickok - Notice from Supply Chain Lead

Confidential Attachment 6 - 2021-01-04 - Hickok - Notice from Shipping Agent

Attachment 7 - 2021-01-05 - Hickok - Notice from Project Director

**Confidential Attachment 1**  
2021-01-04 - North Bend -  
SNC Notice of Force Majeure Event



**SNC • LAVALIN**

**SNC-Lavalin Constructors Inc.**  
11335 NE 122<sup>nd</sup> Way, Suite 200  
Kirkland, WA USA 98034-6937

☎ 425.489.8000 📠 425.489.8003

Attn: Mark B. Vannice, PE, Project Director  
Birla Carbon USA, Inc.  
Regional Office Marietta  
1800 West Oak Commons Ct  
Marietta, GA 30062

SNC Letter: BC-009

Re: Purchase Order No. 2300002188; Notice of Force Majeure Event Update – Status as of January 4<sup>th</sup>, 2021

Dear Mr. Vannice:

Reference is made the above Purchase Order and the Professional Services Terms and Conditions (Agreement) and Letters BC-001 dated May 13<sup>th</sup>, 2020 and BC-002 dated June 17<sup>th</sup>, 2020. Terms not otherwise defined herein shall have the meaning assigned to them in the Agreement.

In accordance with Article 12(a) of the Agreement Engineer is providing Owner an update to the Force Majeure Event notice of May 13<sup>th</sup>, 2020. The Force Majeure Event is primarily the domino effect of uncontrolled delays and disruption of the global supply chain the Owner is experiencing from its Vendors supplying material and equipment to the Facility project; and secondarily the potential delay caused by disruptions in the available services to, and mobility of, Engineers' staff. The delays and disruptions to the supply chain as we are informed by notices from the Vendors to you are caused by impacts of the COVID-19 epidemic on the manufacture of materials and equipment. These delays are outside the control and without the fault of Engineer. To the extent these delays experienced by the Vendors affects the timely delivery of our Work that depends on inputs of information and ultimately delivery to the Facility in accordance with the Schedule, we are, or likely will be, seeking extensions on the Schedule for a time reasonably necessary to overcome the effect of the delay and additional compensation as appropriate. We are to the extent possible undertaking reasonable measures to make up for time lost caused by the delay and assisting Owner, to the extent possible, mitigating Vendor impacts.



January 4<sup>th</sup>, 2021  
Mr. Mark Vannice  
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As of January 4<sup>th</sup>, we are still informed by Owner's Vendor [REDACTED] that they are incurring delays of anywhere from two (2) to six (6) months for various components of the AQCS due to the lack of access to manufacturing facilities in connection with the restrictions related to the COVID-19 virus.

In addition, Owner's Vendor [REDACTED] has delayed their hydrotest dates until January 11<sup>th</sup> and 15<sup>th</sup> 2021, causing a delay of approximately two months to the delivery of the HRSG.

Additionally, the entire North Bend plant was evacuated the week of August 24<sup>th</sup>, 2020 due to two named storms, Hurricane Laura and Tropical Storm Marco.

Also, the entire North Bend facility was evacuated again October 8<sup>th</sup> – 11<sup>th</sup>, 2020 for Hurricane Delta. This evacuation has initially delayed the piling contractor [REDACTED] and they have issued a Force Majeure notice for this event. The piling is now complete and this has been incorporated into the current schedule.

These potential delays by the Vendors and the evacuation of the site the week of August 24<sup>th</sup> and again in October translates to a corresponding delay affecting the Engineer's Schedule that is also outside the control and without fault of Engineer. Engineer is taking every effort to overcome or mitigate the potential delays and will keep you informed as further information becomes available, so that we can work together cooperatively to address any problems that may arise on your Facility project.

After incorporating all the known FM delays and impacts into the project schedule, the completion date for the project is currently November 22<sup>nd</sup>, 2021. This is a total delay of just over 7 weeks from the original schedule target date of October 1<sup>st</sup>, 2021.

We continue to monitor the situation and will keep the Owner apprised of additional delays when they are discovered.

Please feel free to contact me at (425) 985-4263 or [scott.oblander@snclavalin.com](mailto:scott.oblander@snclavalin.com) if you have any questions.



**SNC • LAVALIN**

January 4<sup>th</sup>, 2021

Mr. Mark Vannice

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Sincerely,

Scott Oblander, PE

Project Manager

Power Grid Industrial Solutions

Infrastructure

Scott  
Oblander  
r -- SNC-  
Lavalin

Digitally signed  
by Scott

Oblander --  
SNC-Lavalin

Date:

2021.01.04

10:48:16 -08'00'

cc: Andrew Bauer, Birla  
Nick Johnson, SLCI  
David Lund, SLCI

## **Confidential Attachment 2**

2020-11-27 - Hickok - Worley Project Update



BIRLA CARBON USA, INC

# Monthly Report November 2020)

## Hickok Air Quality Control Upgrade Project

(Period Ending 27 November 2020)



Document No  
09 Dec 2020

308042-15617 - HAQCU-00-PM-REP-0021

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### Disclaimer

*This Report has been prepared on behalf of and for the exclusive use of Birla Carbon USA, Inc, and is subject to and issued in accordance with the agreement between Birla Carbon USA, Inc and Worley Group. Worley accepts no liability or responsibility whatsoever for it in respect of any use of or reliance upon this Report by any third party. Copying this report without the permission of Birla Carbon USA, Inc or Worley is not permitted.*

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Appendix 6 – Level III Construction Schedule  
Appendix 7 – Level III Start-Up and Commissioning Schedule

## 1. Executive Summary

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### 1.1 Executive Summary

This is the monthly progress report created for Birla Carbon to track the progress of Hickok Air Quality Control Upgrade Project for the period ending November 2020.

This is the twenty-first Monthly Report developed for the project and continues to serve to communicate the expected format and content of all Monthly Reports generated throughout the project lifecycle. This content may expand or contract at some point if it is determined that the current project stage justifies different information. This current format and content meet all requirements of EPC Contract Exhibit L.

### 1.2 Project Management High Level Update

Worley issued a letter to Birla Carbon on March 29, 2020 notifying of decision to demobilize the project site in light of the COVID-19 Force Majeure impact on safety and supply chain. The site completed demobilization on April 1, 2020. Worley has committed to uphold our responsibility to mitigate the Force Majeure impact to the best of our ability and began submitting weekly COVID-19 impact reports which document the timeline of events, schedule impacts, and forecasted cost impacts.

As the site team fully remobilized on May 4, 2020 Worley and their subcontractors remain committed to mitigating or minimizing all impacts of the Covid-19 pandemic including HSE considerations, project costs and schedule slippage.

A preliminary re-baseline of the construction and Completions schedule was presented to Birla Carbon in mid May. This schedule reflects the project impacts of the April site stand down along with the productivity impacts due to the new site social distancing practices. This project preliminary re-baseline now forecasts and Mechanical Completion date of late October and a Continuous Operation date of mid March 2021.

Worley and our subcontractors continued to perform the work during the month of November to best achieve the dates presented in this schedule.

Worley submitted a Request for Mechanical Completion Certificate to Birla Carbon on November 04, 2020.

### 1.3 Critical Issues List

- Continued management and mitigation of COVID-19 impact to project goals.

### 1.4 Engineering High Level Update

Worley reached substantial engineering completion at the end of April.

The engineering team will continue to work with the site team to resolve any RFIs and will continue to participate in the start-up and commissioning planning as necessary.

### 1.5 Construction and Site Activities High Level Update

Worley and Alberici continued site activities throughout the month of November. Activities related to site grading and clean-up, electrical installation, and punch list activities all continued. Supporting crafts of equipment operators, touch-up paint, and scaffolding erection were also onsite and all demobilized during the month. Critical project activities were completed and construction requested the Mechanical Completion Certificate on November 04, 2020.

Alberici's completed final construction clean-up for the project footprint. Alberici continued site demobilization and load out during the month.

[REDACTED] completed miscellaneous punch list activities and completed demobilization from the project site.

[REDACTED] complete site grading activities south of the project footprint. The project parking and laydown areas [REDACTED] also assisted with general site clean-up activities. The final grading was pending logistics with Frac tank use for the WHRB clean-out. Final site grading will be completed the first week of [REDACTED] will be demobilized from the project site.

[REDACTED] completed the remaining heat trace components and terminations. Site lighting and power receptacles were also completed during the month. [REDACTED] month.

[REDACTED] assisted with final site scaffolding needs. During the month, all scaffold was removed from the project footprint and material was demobilized for the project site.

[REDACTED] completed final miscellaneous touch-up paint for the project and demobilized from the project.

[REDACTED] also completed the insulation scope of the project and demobilized from the project site.

Piping and Equipment completed the areas required to be left off for stack insulation at the ladder the first week of November.

HT-01 commissioning package was turned over the first week of November. [REDACTED] structural steel, ductwork, civil, and foundation quality packages. These resulted to release construction for requesting the Mechanical Completion Certificate.

The Worley team has been submitting a weekly site report to Birla to demonstrate the weekly progress and upcoming lookahead schedule.

### 1.6 Start-Up and Commissioning High Level Update

The Worley SU&C team continued with the various scheduled start-up and commissioning activities including loop checks, first fire of both incinerators on natural gas, a refractory dry-out of both incinerators and stack.

## 2. Health, Safety and Environment (HSE)

### 2.1 Safety Information and Reports

	Hours Month	Hours PTD	LTI	LTIFR	Total Recordable Injuries	Total Recordable Injury Frequency Rate (per 200 000 hrs)	Near Miss Events (To Date)	First Aid Cases (To Date)
US East	467	26,691	0	0	0	0	0	0
Mumbai (GDC)	33	24,590	0	0	0	0	0	0
Worley Site	1,150	5,297	0	0	0	0	0	0
Alberici Site	525	29,360	0	0	0	0	0	0
Alberici Subs	1,217	54,615	0	0	1	3.66	2	1
Other Subs - Site	600	8,257	0	0	0	0	0	0
Project Overall	3,992	148,810	0	0	1	1.34	2	1

$$\text{Total Recordable Injury Frequency} = \left( \frac{\text{Medical Aid Injuries} + \text{Modified Work Injuries} + \text{Lost Time Injuries}}{\text{Total Hours Worked}} \right) * 200,000 \text{ hrs}$$

- LTI: Lost Time Incidents
- LTIFR: Lost Time Incident Frequency Rate
- PTD: Project to Date

### 2.1.1 Near Miss Events

None during the month of November 2020.

### 2.1.2 First Aid Event

None during the month of November 2020.

## 2.2 Environmental Information

There were no environmental incidents to report during the month of November 2020.

## 2.3 COVID-19 Impact and Response

### 2.3.1 Timeline of Events

- **03/11/2020** - WHO declared COVID-19 a global pandemic
- **03/12/20** - Worley issued letter (HAQCU-00-PM-TRE-0018) to Birla Carbon identifying that the COVID-19 global pandemic would constitute a Force Majeure event.
- **03/19/20** - Worley issued COVID 19 response plan to Birla Carbon
- **03/19/2020** - Pennsylvania Governor issues stay home order and shut down of "Non-Essential Businesses"
- **03/20/2020** – Worley US East location transitions all offices to Stage 4 (Mandatory Work from Home) response
- **03/20/2020** – Worley Mumbai GID transitions all offices to Stage 4 (MWFH)
- **03/23/2020** – Worley issued letter (HAQCU-00-PM-TRE-0022) to Birla Carbon providing notice of material and equipment delays due to COVID-19 impacts
- **03/28/2020** - Kansas governor declares Stay at Home order effective 12:01 AM 03/30/2020 thru 04/19/2020.
- **03/30/2020** – Worley issued letter (HAQCU-00-PM-TRE-0022) updating Birla Carbon as to project site stand down.
- **04/01/2020** – Site demobilization complete
- **04/03/2020** – Worley begins submitting weekly COVID-19 Impact report
- **04/15/2020** – Kansas governor Laura Kelly announces that Stay-Home order will be extended through May 03, 2020
- [REDACTED] provides update to fabrication and delivery schedule.
- **04/21/2020** – Worley presented remobilization plans to Birla during Virtual Monthly Site Meeting
- **04/24/2020** – Worley and Birla execute EPC Contract Amendment which clarifies that both Parties have complied with their mutual contractual obligations
- **04/26/2020** – Worley presented new Covid-19 site HSE procedures to Birla.
- **04/27/2020** – Worley and Alberici initiated soft-remobilization and arrived on site.
- **04/29/2020** – Worley's refractory installer subcontractor mobilized trailer and materials.
- **05/03/2020** – Kansas Stay-Home order expired
- [REDACTED] craft labor mobilizes to job site to reconvene construction related activities
- **05/14/2020** – Worley submits to Birla Carbon a preliminary re-baseline of the project Construction and Completions schedule reflecting impact of the Covid-19 Force Majeure event
- **09/04/2020** – Worley submits Force Majeure Change Order #1 to Birla Carbon
- **09/20/2020** – Worley notifies Birla Carbon of positive COVID-19 case amongst one subcontracted site worker
- **09/21/2020** – Worley holds teleconference with Birla Carbon and Alberici to discuss the COVID-19 positive case and determine the return to work plans
- **09/21/2020** – Birla Carbon's HSE Global Director informs Worley that any individual who tested positive for COVID-19, and those who have 1 degree of separation from the positive case, will require a 14 day post exposure quarantine period.
- **9/22/2020** – Worley/Alberici begins providing daily status of COVID-19 positive case.
- **10/05/2020** – Positive case employee and all direct contact personnel return to project site to resume work.





- 11/14/2020 – Worley notifies Birla Carbon that Alberici project manager tested positive for COVID-19. It was determined that two Worley employees, one Alberici employee, and one Birla Carbon employee were in close contact with the infected individual. A 14 day quarantine period was initiated with personnel permitted to return to site on November 30.

### 3. Schedule Overview

#### 3.1 Project Milestones and Level I Schedule

Activity ID	Description	Baseline Dates	Forecast Dates	Actual Dates
MS-05	EPC Notice to Proceed	March 01, 2019		March 01, 2019
E-RVW-1030	30% Design Review	July 31 2019		July 31, 2019
E-RVW-1050	HAZOP	August 2019		December 12, 2019
E-RVW-1060	60% Design Review	October 2019		November 20, 2019
E-RVW-1090	90% Design Review	February 2020		March 18, 2020
C-001-1030	Mobilize Site	July 23, 2019		July 23, 2019
C-002-1150	Tie-In Outage Start	October 28, 2019		October 28, 2019
C-002-1160	Tie-In Outage Complete	November 11, 2019		November 08, 2019
M-3000	Mechanical Completion	September 01, 2020		November 04, 2020
	Substantial Completion	December 15, 2020	February 02 2021 (Zero Float Forecast)	
	Continuous Operation	January 01, 2021	February 16, 2020 (Zero Float Forecast)	

#### 3.2 Updated Monthly Level II Master Schedule

The Level II Engineering and Construction Schedules are respectively included herein as Appendices 3 and 4.

### 3.3 Activities Completed During Current Month

#### 3.3.1 Engineering and Procurement

None Planned.

#### 3.3.2 Construction

Activity ID	Activity Name	Start	Finish
C-050-2000	Commissioning Milestone: System Turnover for DCS-1		2-Nov-20
C-050-2900	Commissioning Milestone: System Turnover for INC-01		2-Nov-20
M-3000	Milestone: Mechanical Completion		3-Nov-20
A4600	Pull Wire for Heat Trace	5-Oct-20	3-Nov-20
A4610	Terminate for Heat Trace	22-Oct-20	3-Nov-20
A4630	Walk-Through / Punchlist System, HT-01	28-Oct-20	3-Nov-20
A4620	Test & Inspect System, Elec and I&C, HT-01	2-Nov-20	3-Nov-20
A4640	Commissioning Milestone: System Turnover for HT-01		3-Nov-20
A4920	Asphalt Paving	4-Nov-20	4-Nov-20
A4810	Install Remaining Conduit After Positive COVID-19 Test, Lighting	12-Oct-20	6-Nov-20
C-013-1480	Pull Wire Lighting	15-Oct-20	11-Nov-20
C-013-1310	Install Electrical Gear, Site, Lighting & Receptacles	15-Oct-20	11-Nov-20
C-013-1570	Terminate, Lighting	26-Oct-20	12-Nov-20
C-013-7000	Terminate, Power Feeder to Building, WHRB	19-Nov-20	19-Nov-20
C-022-0400	Pre-Commissioning / Punchlist, Building, [REDACTED]	19-Nov-20	20-Nov-20

### 3.3.3 Start-Up and Commissioning

Activity ID	Activity Name	Start	Finish
M-AL-2995	Milestone: Mechanical Completion Certification Request Submitted		04-Nov-2020 A
C-050-1600	Milestone: System Turnover for CEMS-1		02-Nov-2020 A
C-050-2000	Milestone: System Turnover for DCS-1B (Final Connection - Fiber Optic / Tail Gas)		02-Nov-2020 A
C-050-2900	Milestone: System Turnover for INC-01		02-Nov-2020 A
A2380	Milestone: System Turnover for HT01		04-Nov-2020 A
A2620	██████████ on Site Complete Install and Commission Incinerators Analyzers	16-Nov-2020 A	20-Nov-2020 A
A2630	██████████ on Site - For WHBR Operations startup	17-Nov-2020 A	18-Nov-2020 A
A2020	Mech System Check Out - CW-00	09-Nov-2020 A	17-Nov-2020 A
A1550	Loop Check INC-02	30-Oct-2020 A	06-Nov-2020 A
A1610	██████████ Checklist - Ready for Ignition	12-Nov-2020 A	12-Nov-2020 A
A1590	Run Fans, Logic Checks - Burner Management Simulation Check INC-02	15-Nov-2020 A	20-Nov-2020 A
A1620	Initial Firing of Burners on Natural Gas Only INC-02	21-Nov-2020 A	22-Nov-2020 A
A2360	Startup & Test on Cold Air IDF-01	26-Oct-2020 A	02-Nov-2020 A
A1840	Loop Check WHRB-1	27-Oct-2020 A	02-Nov-2020 A
A2190	Mobilization / Install Temp Equip for Chemical Cleaning of WHRB	02-Nov-2020 A	02-Nov-2020 A
A2200	Chemical Cleaning FW Line and WHRB	03-Nov-2020 A	06-Nov-2020 A
A1910	Logic Check in DCS for WHRB-1	13-Nov-2020 A	13-Nov-2020 A

A1920	Startup & Commissioning for WHRB-1	16-Nov-2020 A	16-Nov-2020 A
A1760	Loop Check INC-01	26-Oct-2020 A	13-Nov-2020 A
A1780	Startup & Test CAF-01	26-Oct-2020 A	13-Nov-2020 A
A1810	██████████ Checklist - Ready for Ignition	12-Nov-2020 A	12-Nov-2020 A
A1800	Run Fans, Logic Checks - Burner Management Simulation Check INC-01	13-Nov-2020 A	17-Nov-2020 A
A1820	Initial Firing of Burners on Natural Gas Only INC-01	13-Nov-2020 A	17-Nov-2020 A
A1830	Fire Incinerator 1 (INC-01) on Natural Gas only & operate WHRB to dry all refractory	18-Nov-2020 A	20-Nov-2020 A
A2480	WHRB OJT Training	13-Nov-2020 A	19-Nov-2020 A
A2450	BMS OJT Training	13-Nov-2020 A	17-Nov-2020 A
A2560	Issue Draft Procedure - First Fire on Tail Gas (N/A - See Manual)		24-Nov-2020 A

### 3.4 Next Month Look Ahead for Project Client Review Activities

#### 3.4.1 Planned Client Review Activities Starting

None planned.

### 3.5 Next Month Construction Look Ahead

#### 3.5.1 Activities Finishing – Alberici

None planned. Only punch list and clean up remaining.



### 3.5.2 Start-Up and Commissioning

Activity ID	Activity Name	Start	Finish
	on Site - INC-1& 2 - Post Refractory dry-out inspection walk down	12-Nov-2020 A	16-Dec-20
A1470	Startup & Commission DCS-1	29-Sep-2020 A	4-Dec-20
A1640	Develop Final Plan and Schedule with Birla for first Introduction of Tail Gas	24-Nov-2020 A	10-Dec-20
A2120	Post Refractory dry-out inspection walk down on INC-1 & 2	4-Dec-20	8-Dec-20
A2670	Drone Inspection for Stack (1 Day - TBD)	4-Dec-20	8-Dec-20
A2125	to tie-in to the existing DCS	7-Dec-20	9-Dec-20
A2680	SAT for DCS	9-Dec-20	9-Dec-20
A2660	Birla Heat Up of U2 Reactor Refractory Replacement	10-Dec-20	13-Dec-20
A2320	Duct Sweep (INC - 2 & 1)	9-Dec-20	9-Dec-20
A2330	Pre-light Purge Incinerator -2 (INC-2) / Fire on Natural Gas & Heat up INC-2 to 1600F	10-Dec-20	10-Dec-20
A2070	Fire Incinerator 2 (INC-02) on Tail Gas	11-Dec-20	14-Dec-20
A2340	Pre-light Purge Incinerator -1 (INC-1) / Fire on Natural Gas & Heat up INC-1 to 1600F	16-Dec-20	16-Dec-20
A2080	Fire Incinerator 1 (INC-01) on Tail Gas & Operate WHRB	17-Dec-20	20-Dec-20
A1650	Startup & Commissioning for CEM-1	15-Dec-20	19-Dec-20
A2490	BOP OJT Training	27-Sep-2020 A	9-Dec-20
A2510	DCS OJT Training	10-Dec-20	16-Dec-20
A2470	CEMS OJT Training	15-Dec-20	21-Dec-20

### 3.5.3 Activities Starting and Finishing – Other Subcontractors

#### 3.5.3.1 Refractory Installation - [REDACTED]

All refractory work was completed by the end of June. There are no further mobilizations expected.

[REDACTED]  
[REDACTED] will remobilize in early December to complete the work related to the pre-engineered metal buildings.

### 3.5.4 Construction to Commissioning Turnover Walk Down Dates

All scheduled construction packages have been completed and turned over to the commissioning team.

## 4. Procurement / Materials

### 4.1 Procurement Status

Description	PO Planned Date	PO Actual Date		Site Delivery Date
<b>Equipment</b>				
Incinerator	March 08, 2019	March 08, 2019		March 2020 (COMPLETE)
Stack	March 08, 2019	March 08, 2019		February 2020 (COMPLETE)
Waste Heat Recovery Boiler	March 08, 2019	March 08, 2019		February 2020 (COMPLETE)
Fans	March 08, 2019	March 08, 2019		February 2020 (COMPLETE)
CEMS/DAHS	October 2019	October 23, 2019		July 2020 (COMPLETE)
DCS Upgrade	October 2019	September 25, 2019		Hardware Shipped to PDC Supplier March 2020 (COMPLETE)
4160V Contactor	June 2019	June 7, 2019		September 10, 2019 (COMPLETE)
Power Distribution Center (PDC)	September 2019	September 25, 2019		June 2020 (Complete)



Unit Auxiliary Transformer	September 2019	September 25, 2019		April 2020 (COMPLETE)
Pre-Engineered Metal Building	December 2019	February 2020		June 2020 (COMPLETE)
<b>Materials</b>				
Piping and Piping Specialities	Phase 1 (Tie In) = September 2019	September 13, 2019		October 2019 (COMPLETE)
Piping and Piping Specialities	Phase 2 = December 2019	December 19, 2019		March/April 2020 (COMPLETE)
Tail Gas Ductwork	Phase 1 (Tie In) = September 2019	September 13, 2019		October 2019 (COMPLETE)
Tail Gas Ductwork	Phase 2 = December 2019	December 19, 2019		March 2020 (COMPLETE)
Steel	Phase 1 (Tie In) = August 2019	July 30, 2019		October 2019 (COMPLETE)
Steel	Phase 2 = November 2019	November 26, 2019		March/April 2020 (COMPLETE)
Valves	Phase 1 (Tie In) = September 2019	September 25, 2019		October 2019 (COMPLETE)

Valves	Phase 2 = December 2019	February 28, 2020		March/April 2020 (COMPLETE)
Balance of Plant Instrumentation (Transmitters and Flow Elements)	January 2020	April 7, 2020		June 2020 (COMPLETE)
Balance of Plant Instrumentation (Gauges)	January 2020	April 10, 2020		June 2020 (Complete)
Expansion Joints (TG Fan Inlet)	January 2020	January 31, 2020		March 2020 (COMPLETE)
Miscellaneous pipe specialities (Hoses, strainers, etc.)	Phase 2 = December 2019	February 28, 2020		March/April 2020 (COMPLETE)
Phase 2 Pipe Supports	January 2020	March 2, 2020		April/May 2020 (COMPLETE)

Description	PO Planned Date	PO Actual Date	
<b>Subcontracts</b>			
Construction Contractor	June 2019	June 12, 2019	
Laser Scanning	March 2019	March 25, 2019	
Topological Surveyor	April 2019	April 18, 2019	
Geotechnical Investigation	April 2019	April 25, 2019	

Subsurface Scanning	April 2019	April 25, 2019	
Performance Testing		October 2020	

#### 4.2 Contractor Disputes and Issues with Subcontractors and/or Vendors

None to report this period.

## 5. Engineering

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### 5.1 Summary

Engineering was substantially complete as of the end of April.

### 5.2 Process

Nothing to report.

### 5.3 Mechanical/Piping

Team is responding to construction inquiries as needed.

### 5.4 Civil/Structural/Architectural

Team is responding to construction inquiries as needed.

### 5.5 Electrical

Team is responding to construction inquiries as needed.

### 5.6 Instrumentation and Control

Team is responding to construction inquiries as needed.

### 5.7 Engineering Issues and Concerns

The following issues and concerns have been identified:

1. None requiring any additional or subsequent input or review.

## 6. Photos

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*Figure 1-Site Photo from November 27, 2020*

Refer to weekly site reports for additional progress photos.

Select Birla Carbon personnel now have regained access to the site camera.

## 7. Quality Assurance and Quality Control

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### 7.1 Engineering/Procurement Non Conformances

Refer to Non Conformance Log in Appendix 8.

### 7.2 Procurement

All factory inspections are complete.

The DCS Site Acceptance Test will occur in December.

### 7.3 Construction

Site quality procedures are being followed. Nothing to report. Refer to NCR log.

## 8. Construction and Site Activities

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The following construction related activities took place during the month of November:

1. Completed Heat Trace cable pulls and terminations to panel.
2. Completed site lighting and power receptacles, cable pulls, and terminations.
3. Completed installation of WHRB building transformer and termination.
4. Completed insulation and personnel protection on Train 1 Incinerator.
5. Completed insulation/ personnel protection at stack ladder.
6. Completed instrumentation tubing bundles final heat trace and insulation.
7. Completed final miscellaneous touch-up painting.
8. Completed site grading clean-up, laydown area grading and resurfacing.
9. Completed asphalt paving.
10. Completed scaffold disassembly throughout project.
11. Continued miscellaneous punch list items.
12. Continued project load out activities and overall site clean-up.
13. Assisted with WHRB flushing and other commissioning activities.
14. Completed and turned over commissioning packages HT-01.
15. Completed turnover of structural steel, ductwork, civil, and foundation quality packages.
16. Submitted for the Mechanical Completion Certificate.

### 8.1 Level III Detailed Construction Schedule

Presented as Appendix 7.

### 8.2 Workforce Curves, Planned and Actual

Workforce curves are presented in Appendix 6.

### 8.3 Issues and Concerns

1. None at this time.

## 9. Permitting

### 9.1 Permitting Status (Contractor)

The following permits were explicitly identified as the responsibility of the Contractor within the EPC Contract.

Permit Name	Status
City of Ulysses Building Permit	Closed. None required
City of Ulysses Mechanical Permit	Closed. None required
City of Ulysses Electrical Permit	Closed. None required

### 9.2 Permitting Status (Owner)

The following permits were explicitly identified as the responsibility of the Owner within the EPC Contract.

Permit Name	Status
Land Use Permits	Closed. None required.
Air Permits	Closed. None required.
Electrical Utility Tie-In Permit	Not Required.
Construction Stormwater Permit/Program	Birla Carbon has informed Worley that the NOI was submitted to the state of Kansas and approval was granted. This issue is considered closed.



## 10. Management of Change

### 1.1 90 Day Assessment Items

Closed.

### 1.2 Project Change Log

Worley will maintain a log of all potential and approved project changes that have a net impact on Contract Value and/or Baseline Schedule. Formal Project Variance Notices (PVN) will be submitted for each item listed below providing a complete breakdown of impact related to engineering, procurement, and construction costs.

Change Number	Change Description	Scope/Cost Impact	Schedule Impact	Cost of Change	Client Approval
1	Condensate piping w/in TG Boiler Building (90 Day Assessment Item #1)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
2	Drafting of existing site Single Line Diagrams (90 Day Assessment Item #2)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
3	Existing Steel Structure Assessment (90 Day Assessment Item #3)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
4	Existing Steel Structure Assessment (90 Day Assessment Item #4)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
5	Crane Access through alley way (90 Day Assessment Item #5)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
6	Medium Voltage Contactor Foundation (90 Day Assessment Item #6)	No.  (Refer to letter HAQCU-00-PM-TRE-0004)	No	N/A	N/A
7	Over-excavation of Compressible Soils (90 Day Assessment Item #7)	Yes	No	TBD	Worley waiting for all work to be completed.

8	36" Pressure Control Butterfly Valve at Tail Gas Tie-In	Yes (Refer to [REDACTED] 000006)	No	\$98,326	Approved and awaiting PO update.
9	Worley support of Construction Stormwater Permit (SWPPP) Application	Yes (Refer to [REDACTED] 000006)	No	\$7,441	Rejected via letter dated 09/16/2019
10	Impact of Tail Gas Fan sizing (motor size increase and residual impacts including electrical gear, PDC size and procurement timing, cable size, auxiliary transformer size and procurement timing.	No (Issue was collaboratively resolved)	No	N/A	N/A
11	Instrumentation Design [REDACTED] Scope of supply	Yes (Refer to [REDACTED] WORLEYP-GNC-000175)	YES	TBD	Awaiting resolution.
12	Implementation of Washdown Trench Drain	Yes (Refer to [REDACTED] 000007)	YES	\$87,279	Approved and awaiting PO update.
13	Flange Installation on 6" Steam Temporary Piping Tie-In	Yes (Refer to [REDACTED] 000023)	No	TBD	Complete impact of temporary works will be assessed and presented
14	Redundant HVAC for CEMS Shelter	Yes	Yes	T&M estimated at \$5,040	Approved.
15	Plant air supply reduction to 60 psig.	Yes	Yes		Closed
16	UPS Datalink Addition	Yes (Refer to [REDACTED] 000034)	No		Closed
17	HAZOP Impact Assessment	Yes (Refer to [REDACTED] 000035)	Yes		Resolved between Worley and Birla Carbon
18	Metallic vs. Fabric Expansion Joint Technical Variance	Credit offered to Birla Carbon.			Resolved between Worley and Birla Carbon

19	480V Power Cable Sheathing NCR	Credit offered to Birla Carbon.			Resolved between Worley and Birla Carbon
20	COVID-19 Response and Force Majeure Impact	YES	YES		On-going mitigation of impact by all stakeholders.
21	90% Design Review Outcome – Platforming for Combustion Air and Tail Gas In-Line Piping Components	YES	Likely		Meeting between Worley and Birla Carbon to be scheduled to discuss opportunities
22	Reduction in Personnel Protection Material	YES	YES		Refer to letters HAQCU-00-PM-TRE-0041 and -0043
23	Landfill Maintenance Due to Carbon Black Contaminated Soil	YES	NO		Refer to email sent to Vannice and Bauer on July 1, 2020
24	COVID-19 Force Majeure Site Stand Down	YES	YES		

Activity Name	Original Duration	% Complete	Start	Finish	Total Float	2019												2020											
						Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec

Start Date: 13-Jan-21  
Finish Date: 27-Jan-21  
Data Date: 27-Nov-20  
Run Date: 07-Dec-20

Actual Level of Effort

Actual Work

Rem Work

Near Crit Rem

Remaining Work

Critical Remaining Work

% Complete

Mile-stone

Start Constant

Finish Constant

Birla Carbon EPC Construction Schedule  
Update DD 27-Nov-20 - Resource Leveled

Layout: Master Schedule w/ Float Filter: TASK filter: Master Layout		19037_82 - Birla Carbon EPC Construction Schedule Update DD 27-Nov-20 - Resource Leveled												Data Date: 27-Nov-20 Page 2 of 30									
Activity ID	Activity Name	Original Duration	% Complete	Start	Finish	Total Float	2019			2020			2021										
							Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May

Layout: Master Schedule w/ Float Filter: TASK filter: Master Layout										19037_82 - Birla Carbon EPC Construction Schedule Update DD 27-Nov-20 - Resource Leveled										Data Date: 27-Nov-20 Page 3 of 30																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
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## A.7 Level III Start-Up and Commissioning Schedule

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## **Confidential Attachment 3**

2020-12-30 - Hickok - Worley Project Schedule

Activity ID	Activity Name	OD	% Comp	Start	Finish	Tota	y 2020	J	July 2020	A	S	O	N	D	J	F	M																							
						Float	0	1	2	3	0	1	2	2	0	1	1	2	0	0	1	2	2	0	1	1	2	0	0	1	2	3	0	1	2	2	0	1	2	2





Birla Hickok Air Quality Upgrade Project StartUp and Completions Schedule  
Project Layout II



Activity ID	Activity Name	OD	% Comp	Start	Finish	Total Float	Y 2020	J	July 2020	A	S	O	N	D	J	F	M																							
							0	1	2	3	0	1	2	2	0	1	1	2	0	0	1	2	2	0	1	1	2	0	0	1	2	3	0	1	2	2	0	1	2	2



**Confidential Attachment 4**  
2021-01-04 - Hickok -  
COVID-19 Impact Schedule Analysis

# Hickok Air Quality Control Upgrade Project

## COVID-19 Impact Schedule Analysis

Prepared for Birla Carbon USA  
January 04, 2021



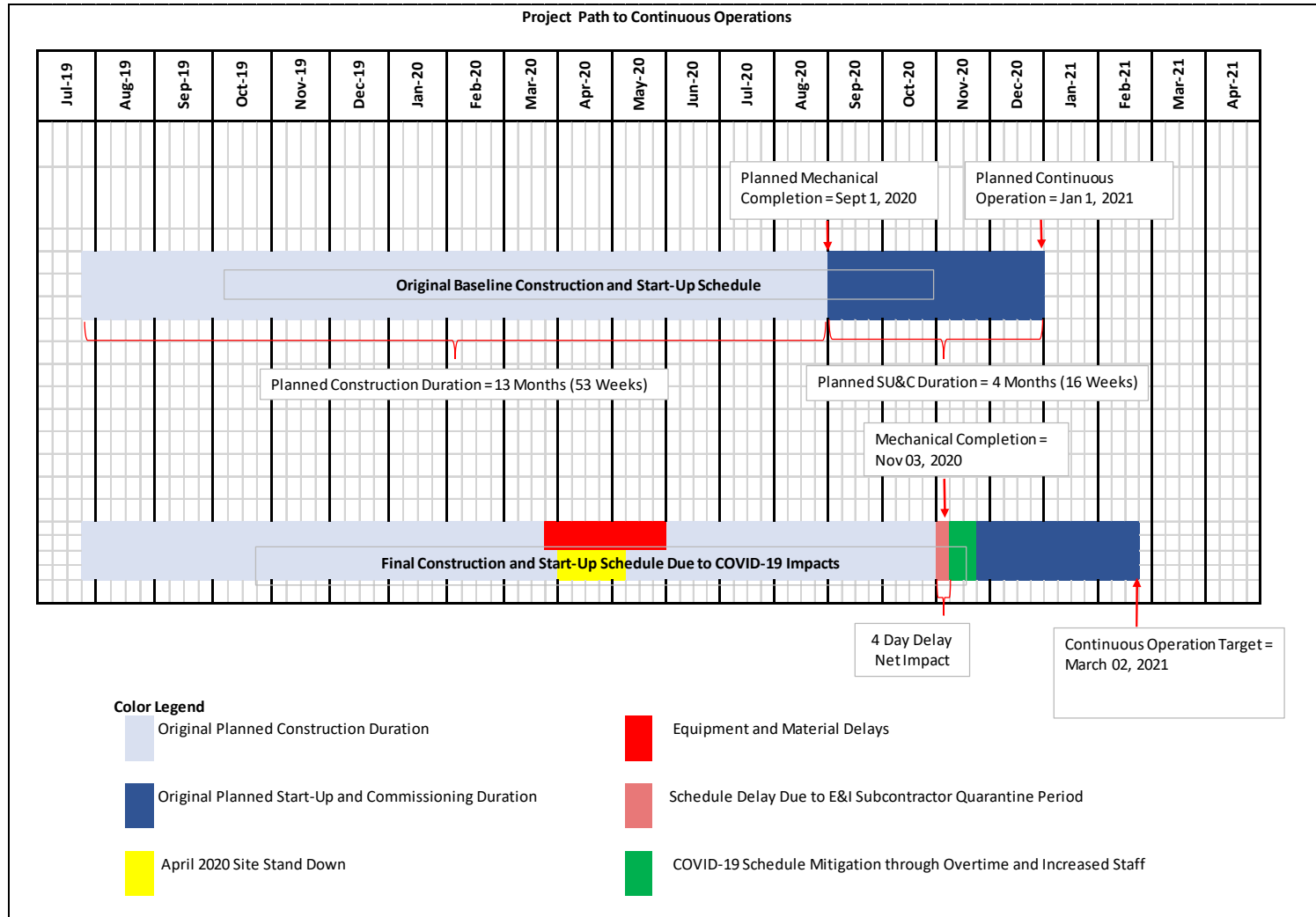
**Purpose: To identify the effects of the COVID-19 Global Pandemic Force Majeure event on the Birla Carbon Hickok Project.**

- Project was initially planned to achieve the Compliance Date of 01/01/2021.
- COVID-19 Global Pandemic directly delayed delivery of equipment and material with a direct negative impact on schedule critical path.
- Subsequently the COVID-19 Global Pandemic caused other schedule delays on the project.
- The project is currently forecasting a target compliance date of 03/02/2021.

Project was logically sequenced to install:

- Perform earthworks/foundations
  - Install Equipment
  - Install Steel Racks
  - Erect Piping
  - Install Electrical
  - Mechanical Completion
  - Commissioning
  - Compliance Date
- 
- COVID-19 Global Pandemic directly delayed delivery of critical equipment/material during the equipment installation period and at the start of the bulk pipe installation period.
  - Vendors began to notify Worley of known delays in March 2020
  - The equipment and material delays caused a 45 day delay to the project construction schedule
  - Worley and its subcontractor Alberici have been able to mitigate a portion of this equipment/material supply chain negative effect and some of the additional COVID-19 Global Pandemic effects to target a compliance date of 03/02/2021, 60 days after the originally planned compliance date.

# Schedule Impact Overview



# Material and Equipment Delays

Activity Name	Pre-Covid DD: March 27, 2020 Finish Date	Post-Covid DD: May 08, 2020 Finish Date	Actual Delivery DD: Nov 13, 2020 Finish Date	Variance from Baseline	Craft
Ductwork (Combustion Air)	17-Apr-20	5-May-20	May 5, 2020	18	Boiler Makers
Misc. Loose Ship Items	17-Apr-20	19-May-20	May 22, 2020	35	Boiler Makers
Ductwork (Tail Gas)	17-Apr-20	21-May-20	May 26, 2020	39	Boiler Makers
Pipe Skids	10-Apr-20	18-May-20	May 22, 2020	42	Boiler Makers
Pilot Air Line	17-Apr-20	21-May-20	June 1, 2020	45	Boiler Makers
Ductwork (Boiler)	17-Apr-20	21-May-20	June 1, 2020	45	Boiler Makers
Ductwork	17-Apr-20	8-May-20	June 1, 2020	45	Boiler Makers
Expansion Joints	17-Apr-20	27-May-20	June 4, 2020	48	Boiler Makers
DELIVERY: WORLEY - Pipe Supports (Atomizer Cooling Air Piping)	27-Apr-20	18-May-20	May 13, 2020	16	Piping
DELIVERY: WORLEY - Damper Valves	19-Jun-20	24-Jun-20	July 8, 2020	19	Piping
DELIVERY: WORLEY - PCV Valve	19-Jun-20	24-Jun-20	July 8, 2020	19	Piping
DELIVERY: WORLEY - Pipe Supports (Duct)	15-Apr-20	15-May-20	May 13, 2020	28	Piping
DELIVERY: WORLEY - Pipe Supports Del. Complete (Small & Large Bore Piping)	20-Apr-20	15-May-20	May 20, 2020	30	Piping

*\*Critical path activities (Less than 5 days Schedule Float) highlighted in yellow*



# Equipment Supplier Delay Notifications

Item	Supplier/Location	Supplier COVID-19 Impact Notification Date	Original Planned Delivery Date	COVID-19 Delayed Delivery Date (Actual)	
Fuel Skids			March 20, 2020	April 10, 2020	Arrived at site on May 26, 2020
BMS Panels			March 20, 2020	March 23, 2020	Shipped to downstream integrator on April 23, 2020.  Arrived at site with PDC in late June 2020.
36" Pressure Control Valve			March 18, 2020	June 16, 2020	Valves and air tanks arrived at site on July 08, 2020
36" On/Off Dampers			March 18, 2020	June 16, 2020	Valves and air tanks arrived at site on July 08, 2020
PCC Flow Elements / Dampers / Control Valves / Incinerator Mounted Instrumentation			March 20, 2020	April 17, 2020	Arrived at site on May 22, 2020

# Material Supplier Delay Notifications

Item	Supplier/Location	Supplier COVID-19 Impact Notification Date	Original Planned Delivery Date	COVID-19 Delayed Delivery Date (Actual)
Pipe Supports and Hangers		March 30, 2020	April 20, 2020	All supports received on site by May 20, 2020
Combustion Air Ductwork		March 20, 2020	April 17, 2020	All received on site May 4, 2020.
Tail Gas Ductwork		March 20, 2020	April 17, 2020	Delivered to site on June 01, 2020
WHRU (Boiler) Inlet Ductwork		March 20, 2020	April 17, 2020	Delivered to site on June 01, 2020

# Analysis of Construction Schedule Delay Due to COVID-19 HSE Work Restrictions

	Pre-Covid-19 Schedule			Actualized Schedule with Current Progress				
Activity Description	Duration (Days)	Start Date	Finish Date	Duration (Days)		Duration Variance from Baseline	Start Date	Finish Date
				Less Site Stand Down				
	Schedule Data Date: March 27, 2020			Schedule Data Date: November 13, 2020				
Utility Bridge								
Ductwork	28	May 28, 2020	July 7, 2020	48	48	20	May 7, 2020	September 10, 2020
Electrical	33	May 26, 2020	July 10, 2020	70	70	37	June 25, 2020	October 8, 2020
Piping	26	April 21, 2020	May 27, 2020	45	45	19	May 4, 2020	July 2, 2020
Incinerator Train North								
Ductwork	40	March 18, 2020	May 21, 2020	80	55	15	March 18, 2020	August 26, 2020
Electrical	58	May 26, 2020	August 14, 2020	92	92	34	June 5, 2020	October 15, 2020
Piping	21	June 10, 2020	July 13, 2020	39	39	18	June 4, 2020	July 24, 2020
Incinerator Train South								
Ductwork	37	April 13, 2020	June 3, 2020	58	58	21	May 5, 2020	August 7, 2020
Electrical	58	May 26, 2020	August 14, 2020	90	90	32	June 5, 2020	October 7, 2020
Piping	20	June 25, 2020	July 23, 2020	20	20	0	July 10, 2020	August 3, 2020
ID Fan & Boiler Loop								
Ductwork	10	May 26, 2020	June 8, 2020	55	55	45	June 18, 2020	September 14, 2020
Electrical	60	May 26, 2020	August 18, 2020	75	75	15	August 5, 2020	November 17, 2020
Piping	32	June 5, 2020	July 22, 2020	58	58	26	June 8, 2020	August 27, 2020

Extended durations  
demonstrate inherent  
impact of COVID  
Compliant Work  
Restrictions

# Analysis of Construction Schedule Delay Due to COVID-19 HSE Work Restrictions (Cont)

Construction Subcontractor (Alberici) analysis of schedule duration impact due to new COVID-19 Compliant Work Rules

## 3.4 Impacted Schedule- Project Shutdown and Area Resource Leveling

Figure 3 represents the summary of impact to the March 27<sup>th</sup> data date schedule with the project shut down dates established in the schedule as well as resource leveling the schedule with maximum numbers of trades on the project site and area resource leveling. These two impact items result in a 10/30/2020 Mechanical Completion Date, an impact of (25) workdays due to project shut down and (18) workdays due to resource leveling and total of a (43) workday delay. Resource leveling now has a greater impact due to concurrent activities needing manpower in similar areas. With the limitations of manpower in these areas, activities had to be prioritized and some areas resulted in delays to the schedule.

This impact also represents the actual impact to the project and what had been presented since May 13<sup>th</sup>, 2020 as the resource leveled schedule DD 08-May-20 post project shutdown. Mechanical Completion was represented as 10/30/2020. The project has continued since that point and was reestablished as the requested Mechanical Completion Date in Alberici Correspondence 19037-ACI-WP-007\_Mechanical Completion Schedule Relief dated 08/04/2020. The attached Birla Carbon EPC\_Leveled Schedule\_DD 08-May-20 schedule layout represents the project's schedule upon return to work.

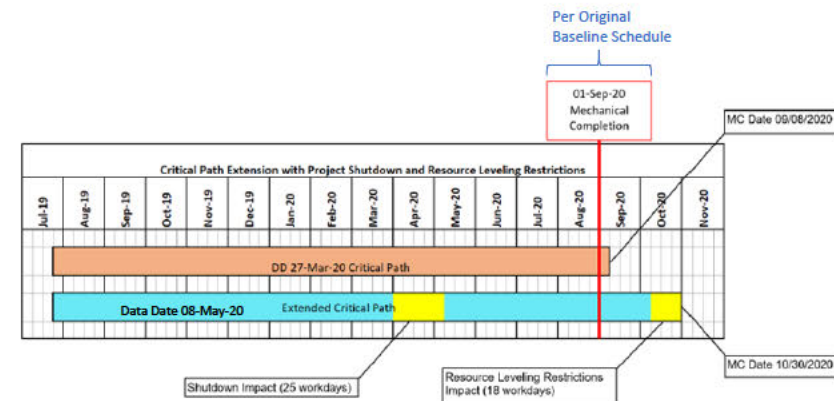


Figure 3 Summary Bar Chart Project Shutdown and Area Resource Leveling Restrictions

# COVID-19 Quarantine of E&I Subcontractor Delay Impact

Expected Mechanical Completion as of September 18, 2020 (prior to 14 day quarantine)

Layout: In Progress and Remaining  
Filter: TASK filters: Master Layout, Not

19037\_72 - Birla Carbon EPC Construction Schedule Update DD 18-Sep-20 - Resource Levelled

ActivityID	ActivityName	Original Duration	% Complete	Start	Finish	Total Float	2020		
							Sep	Oct	Nov
<b>Birla Carbon EPC Construction Schedule Update DD 18</b>		144		21-May-20 A	16-Dec-20	0			
<b>Milestones</b>		53		30-Sep-20	16-Dec-20	0			
<b>Contractual Milestones</b>		31		30-Oct-20	16-Dec-20	0			
M-3000	Milestone: Mechanical Completion	0	0%	30-Oct-20*		-42			△ Milestone: Mechanical Completion

Expected Mechanical Completion as of September 25, 2020 (Reflects planned additional manpower scheduled to help mitigate effect of 14 Day Quarantine of E&I Subcontractor)

Layout: In Progress and Remaining  
Filter: TASK filters: Master Layout, Not

19037\_73 - Birla Carbon EPC Construction Schedule Update DD 25-Sep-20 - Resource Levelled

ActivityID	ActivityName	Original Duration	% Complete	Start	Finish	Total Float	2020		
							Oct	Nov	Dec
<b>Birla Carbon EPC Construction Schedule Update DD 25</b>		144		21-May-20 A	16-Dec-20	0			
<b>Milestones</b>		62		18-Sep-20 A	16-Dec-20	0			
<b>Contractual Milestones</b>		24		10-Nov-20	16-Dec-20	0			
M-3000	Milestone: Mechanical Completion	0	0%	10-Nov-20*		-49			△ Milestone: Mechanical Completion

Expected Mechanical Completion as of October 30, 2020 (Reflects additional Sunday Overtime scheduled to further help mitigate 14 Day Quarantine of E&I Subcontractor)

Layout: In Progress and Remaining  
Filter: TASK filters: Master Layout, Not

19037\_79 - Birla Carbon EPC Construction Schedule Update DD 30-Oct-20 - Resource Levelled

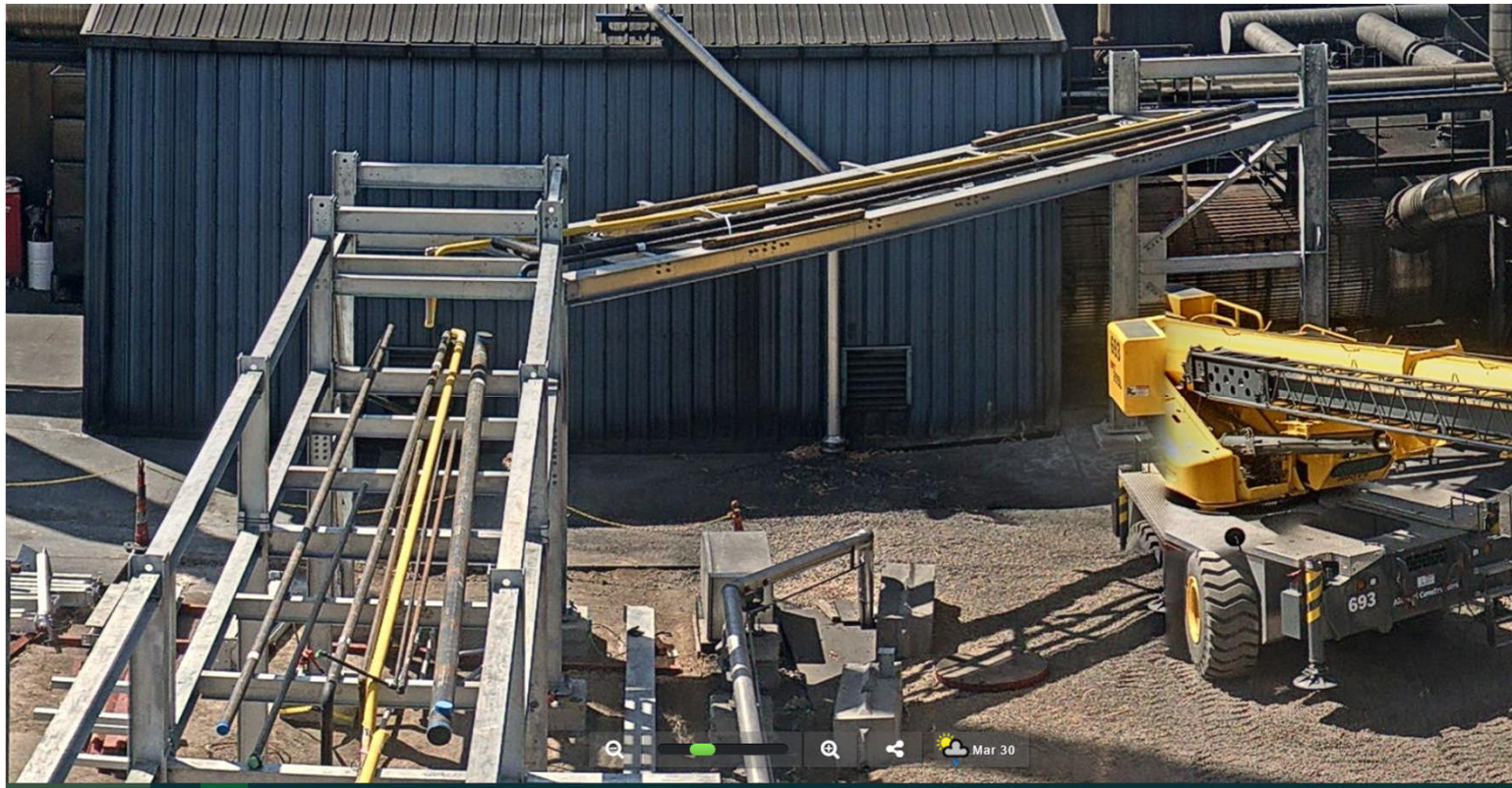
ActivityID	ActivityName	Original Duration	% Complete	Start	Finish	Total Float	2020	
							Nov	
<b>Birla Carbon EPC Construction Schedule Update DD 30</b>		66		25-Sep-20 A	30-Dec-20	0		
<b>Milestones</b>		40		30-Oct-20	30-Dec-20	0		
<b>Contractual Milestones</b>		38		03-Nov-20	30-Dec-20	0		
M-3000	Milestone: Mechanical Completion	0	0%	03-Nov-20*		-44		△ Milestone: Mechanical Completion



# Summary

	Pre COVID-19 Baseline	COVID-19 Impact
Relative Data Date	27-Mar-20	27-Mar-20
March 27, 2020 Construction Duration to Complete (Days)	158	158
Material and Equipment Delay Impact	0	45
COVID-19 HSE Site Work Restrictions	0	18
COVID-19 Quarantine of E&I Subcontractor Delay Impact	0	14
Positive COVID-19 Mitigation Efforts	0	-14
Mechanical Completion	1-Sep-20	3-Nov-20
Commissioning Duration (Days)	122	122
Currently Foreseen Commissioning Duration Reduction (Days)	0	-3
Continuous Operation	1-Jan-21	02-Mar-21

# Piping Placed w/out Supports



**Attachment 5**  
2021-01-04 - Hickok -  
Notice from Supply Chain Lead



**Rahman, Anushka N.**

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**To:** Waskul, Randy  
**Subject:** RE: Vent Scrubber Delivery Delayed

---

**From:** Yeomans, Geoffrey <[Geoffrey.Yeomans@adityabirla.com](mailto:Geoffrey.Yeomans@adityabirla.com)>  
**Sent:** Monday, January 4, 2021 10:05 AM  
**To:** Waskul, Randy <[Randy.Waskul@adityabirla.com](mailto:Randy.Waskul@adityabirla.com)>; Vannice, Mark <[Mark.Vannice@adityabirla.com](mailto:Mark.Vannice@adityabirla.com)>  
**Subject:** Vent Scrubber Delivery Delayed

Hi Randy/Mark,

The Vent Scrubber is delayed due to issues in Asia at the port that are out of our control. We delivered it to the port on 12/22 but there are shipping delays in Asia and the original ship booking was dropped as they claimed that they were overbooked and did not have space.

The shipping companies have recently created a priority program that requires an additional fee, we have paid it, and are on the list. We do not have an updated date of departure at this time, but we will be following up every day this week until we get a spot on a ship. They are aware that this is urgent. I will keep you both informed of our progress.

Geoff Yeomans

--

Supply Chain Lead  
Marietta, GA

**Birla Carbon**

**T:** (770) 792-9462 | **W:** [www.birlacarbon.com](http://www.birlacarbon.com)

**E:** [Geoffrey.Yeomans@adityabirla.com](mailto:Geoffrey.Yeomans@adityabirla.com)

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## **Confidential Attachment 6**

2021-01-04 - Hickok - Notice from Shipping Agent

**Rahman, Anushka N.**

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**To:** Waskul, Randy  
**Subject:** RE: Urgent:: [REDACTED] Scrubber Draft Packing List

**From:** [REDACTED]  
**Sent:** Monday, January 4, 2021 2:05 PM  
**To:** XXXXXXXXXXXXXXXXXXXXXXXXXXXX  
**Cc:** [REDACTED]  
**Subject:** RE: RE Urgent:: [REDACTED] Scrubber Draft Packing List

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Geoff,  
Good afternoon. We finally received booking details.

Plan vessel as –  
Vsl—ONE CONTRIBUTION / 045E  
ETD NHAVA : 18<sup>TH</sup> JAN'21  
**CONNECTING VSL –FROM SIN**  
Vsl-ITAL LUNARE / E103  
ETD SINGAPORE : 29<sup>TH</sup> JAN'21  
ETA KAOHSIUNG: 31<sup>ST</sup> JAN'21  
**CONNCTING VSL FROM KAO-**  
VSL- YM MOBILITY / 055E  
ETD KAOHSIUNG : 07<sup>TH</sup> FEB'21  
ETA OAKLAND,CA : 14<sup>TH</sup> FEB  
ETA DENVER CO: 22<sup>ND</sup> FEB'21

Best regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]





**Attachment 7**  
2021-01-05 - Hickok -  
Notice from Project Director

**Rahman, Anushka N.**

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**Subject:** Hickok Vent Scrubber Delivery & Installation

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**From:** Vannice, Mark <[Mark.Vannice@adityabirla.com](mailto:Mark.Vannice@adityabirla.com)>

**Sent:** Tuesday, January 5, 2021 1:30 PM

**To:** Waskul, Randy <[Randy.Waskul@adityabirla.com](mailto:Randy.Waskul@adityabirla.com)>; Clark, Dale <[Dale.Clark@adityabirla.com](mailto:Dale.Clark@adityabirla.com)>; Bauer, Andrew <[Andrew.Bauer@adityabirla.com](mailto:Andrew.Bauer@adityabirla.com)>

**Subject:** Hickok Vent Scrubber Delivery & Installation

Randy

Per our previous conversation

I am traveling today and do not access to internet.

The estimated time for the Vent Scrubber to clear customs and be delivered to the Hickok Plant is 7 days

The estimated time for installation and testing for the Vent Scrubber is 4 to 6 weeks, once it is arrived on site

If you have questions or need further clarification, please feel free to give me a call

Mark

Mark Vannice, PE  
Project Director EPA 114  
Birla Carbon

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